

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE

TENA J. CLARK,
Plaintiff,

v.

Docket No 1:24-cv-312
JURY DEMAND

MEIGS COUNTY, TENNESSEE; and
CASEY STOKES, in his individual capacity
as Meigs County General Sessions Judge;
Defendants.

REPORT OF DISCOVERY PLANNING MEETING

The Plaintiff and counsel for the parties held a Rule 26(f) meeting. Attorney Franklin Chancey participated on behalf of the Plaintiff. Sheridan C.F. Randolph and Arthur F. Knight, III participated on behalf of Defendants. The attorneys discussed the subject matter and deadlines addressed by Rule 26(f) and the Parties hereby submit this Discovery Plan as follows:

A. The Nature of the Claims and Defenses: The Complaint was filed in this court September 13, 2024.

B. Initial Disclosures. The parties will exchange initial disclosures on or before January 31, 2025.

C. Discovery.

a. Discovery will be needed on the following subjects:

1. Information related to Plaintiff's claims, damages, and allegations set forth in the Complaint;
2. Information related to Defendants' denials and defenses.
3. Any information which is discoverable under FRCP 26.

b. The parties recognize that all discovery must be completed by the deadline established by the court in the Scheduling Order that is still to be entered.

c. The parties at this time do not request any formal phases for discovery.

- d. The parties will attempt to cooperatively make discovery requests and set depositions of the various witnesses with the goal of obtaining factual discovery relevant to Plaintiff's allegations before deposing expert witnesses, insofar as is reasonably necessary.

D. Electronic Discovery. The parties at this time do not anticipate requesting the production of substantial information from electronic or computer-based media. To the extent that electronically stored information is requested, the parties agree that it will be produced in hard-copy or .pdf format. To the extent that disclosure or discovery of information in native format is requested or becomes an issue, the parties will meet to confer over the proper handling of the same and will supplement this Discovery Plan accordingly.

E. Privilege and Trial-Preparation Materials. The parties agree that claims of privilege or of protection as trial-preparation material, including procedures to assert these claims after inadvertent production, will be governed by Federal Rule of Civil Procedure 26(b)(5) and Federal Rule of Evidence 502.

F. Confidentiality of Documents Produced in Discovery. The parties agree that documents produced during the course of this litigation are confidential and should only be used in connection with this matter.

G. Settlement Potential. The parties have determined that the potential for future settlement is unknown at this time. The parties agree that additional discovery needs to be conducted before any authoritative statement regarding the potential for settlement can be made. The parties left open for future discussion the possibility of settlement.

H. Discovery Timing. The parties agree that the limitations imposed on discovery by the Federal Rules of Civil Procedure and the Court's local rules govern this case.

I. Additional Matters.

- a. The parties agree with and will work toward the trial date established by the court in the Scheduling Order.

RESPECTFULLY submitted,

CHANCEY KANAVOS

/s/ H. Franklin Chancey

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